

THE ROSEN LAW FIRM, P.A.

Phillip Kim, Esq. (PK 9384)
Laurence M. Rosen, Esq. (LR 5733)
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com
lrosen@rosenlegal.com

Counsel for Plaintiff and [Proposed]

Lead Counsel for Class

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
JUSTIN DEMARCO, Individually and on behalf of all
others similarly situated,

Case No.: 1:19-cv-05949-MKB-RML

Plaintiff,

v.

PARETEUM CORPORATION, ROBERT TURNER,
and EDWARD O'DONNELL,

Defendants.

**NOTICE OF VOLUNTARY
DISMISSAL WITHOUT
PREJUDICE**

CLASS ACTION

-----X

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Justin DeMarco, through his counsel, hereby voluntarily dismisses this action, without prejudice, against all defendants. No Defendant has either answered the complaint or filed a motion for summary judgment in this case.

There are several substantially similar actions proceeding and pending against the same or similar Defendants in the United States District Court for the Southern District of New York styled as *O'Brien v. Pateteum Corp., et al.*, Case No. 1:19-cv-09767, *Singh v. Pateteum Corp., et al.*, Case No. 1:19-cv-09795, *Mansur v. Pateteum Corp., et al.*, Case No. 1:19-cv-09849, and

Vargo v. Pateteum Corp., et al., Case No. 1:19-cv-09936 (collectively, the “SDNY Actions”).

The SDNY Actions assert claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder, arising from the same conduct as the instant action. The same motions for lead plaintiff have been filed in the SDNY Actions, and the claims asserted in this action will proceed in the SDNY Actions.

This dismissal is without prejudice. Each party is to bear their own costs and fees.

Dated: January 7, 2020

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

Phillip Kim, Esq. (PK 9384)
Laurence M. Rosen, Esq. (LR 5733)
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com
lrosen@rosenlegal.com

*Counsel for Plaintiff and [Proposed]
Lead Counsel for Class*

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim